

**ALLEN & OVERY LLP**

Ken Coleman  
Daniel J. Guyder  
Jonathan Cho  
1221 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 610-6300  
Facsimile: (212) 610-6399

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re:

Chapter 11

Lehman Brothers Holdings Inc., *et al.*

Case No. 08-13555 (SCC)

Debtors.

(Jointly Administered)

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**JOINDER OF THE HSBC PARTIES TO THE OBJECTION OF CITADEL ENERGY  
INVESTMENTS LTD. AND CITADEL EQUITY FUND LTD TO THE MOTION TO  
ALLOW DISCLOSURE OF THE DERIVATIVE QUESTIONNAIRES PURSUANT TO  
SECTION 107(a) OF THE BANKRUPTCY CODE**

HSBC Bank USA, National Association, HSBC Bank plc, HSBC France, and The Hongkong and Shanghai Banking Corporation Limited (collectively, the “**HSBC Parties**”) hereby join in the objections of Citadel Energy Investments Ltd. and Citadel Equity Fund Ltd. [Dkt. No. 49030] (the “**Citadel Objection**”) to the *Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code* [Dkt. No. 48939] (the “**Motion**”) of the above-captioned debtors (the “**Debtors**”).

In support of this joinder, the HSBC Parties respectfully state as follows:

**OBJECTION AND JOINDER**

1. Each of the HSBC Parties is party to certain derivatives contracts with one or more of the Debtors.

2. The HSBC Parties hereby join and incorporate by reference the objections and arguments, in their entirety, made by Citadel Energy Investments Ltd. and Citadel Equity Fund Ltd. in the Citadel Objection as such apply to the HSBC Parties and their contracts with the Debtors.

WHEREFORE, for the foregoing reasons, the HSBC Parties respectfully request that this Court deny the Motion, and, alternatively, if the Court grants the Motion, that this Court direct the Debtors to redact all identifying, confidential and proprietary information from any documents disclosed, including any negotiated agreement such as any ISDA Master Agreements and any Guarantees, and grant such other, further or different relief as this Court deems just and proper.

Dated: New York, New York  
April 1, 2015

**ALLEN & OVERY LLP**

/s/ Daniel J. Guyder  
Ken Coleman  
Daniel J. Guyder  
Jonathan Cho  
1221 Avenue of the Americas  
New York, New York 10020  
Telephone (212) 610-6300  
Facsimile (212) 610-6399  
ken.coleman@allenoverly.com  
daniel.guyder@allenoverly.com  
jonathan.cho@allenoverly.com

*Attorneys for the HSBC Parties*